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7
8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,
10
Plaintiff,

11 vs.

12 KEFER FUNCHES,
aka "Swole,"
13 CALVIN BRYANT,
14 aka "Cal,"
15 ROBERT PERROT,
16 TYRONE PATTERSON,
aka "Ty,"
17 GINNY HARRIS,
18 WILLIAM BERNSTEIN,
aka "Will,"
19 DERON GRINAGE,
20 UNIQUE BEAUFORD,
21 and
22 JENNIFER MCQUAIG,
23
Defendants.

Case No.: 2:24-cr-00064-RFB-EJY
Stipulation for a Protective Order

1 The parties, by and through the undersigned, respectfully request that the Court issue an
2 Order protecting from disclosure to, KEFER FUNCHES, CALVIN BRYANT, ROBERT
3 PERROT, TYRONE PATTERSON, GINNY HARRIS, WILLIAM BERNSTEIN, DERON
4 GRINAGE, UNIQUE BEAUFORD, and JENNIFER MCQUAIG (the defendants), the
5 public, or any third party not directly related to this case, any and all unredacted discovery
6 (the “Protected Material”) in this case. The parties state as follows:

7 1. On April 2, 2024, a grand jury returned an indictment charging the defendants
8 with Conspiracy to Distribute Controlled Substances in violation of 21 U.S.C. §§ 846,
9 841(a)(1), (b)(1)(A)(vi), (b)(1)(A)(viii), and (b)(1)(B)(ii), Distribution of a Controlled Substance
10 in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), and (b)(1)(B)(ii), Money Laundering
11 Conspiracy in violation of 18 U.S.C. § 1956(h), and aiding and abetting in violation of
12 18 U.S.C. § 2. ECF No. 1.

13 2. The trial date is currently set for September 9, 2024. ECF Nos. 80, 82.

14 3. The government has discovery derived from communications intercepted
15 pursuant to Court Order. The government recently received an order unsealing those
16 intercepted communications. However, the communications are voluminous, and personal
17 identifying information is likely contained within multiple wire or electronic communications
18 (the Protected Material). The government believes that redacting all personal identifying
19 information from the Protected Material would require an enormous expenditure of resources
20 and will delay the production of this discovery.

21 4. In order to prevent dissemination of the Protected Material, the parties intend to
22 restrict access to the Protected Material in this case to the following individuals: attorneys for
23 all parties, and any personnel that the attorneys for all parties consider necessary to assist in
24 performing the attorneys’ duties in the prosecution or defense of this case, including

1 investigators, paralegals, experts, support staff, interpreters, and any other individuals
2 specifically authorized by the Court (collectively, the “Covered Individuals”). The defendants
3 shall not obtain a copy of the Protected Material. The defendants may, however, review the
4 Protected Material in the presence of their attorneys.

5 5. Without leave of Court, the Covered Individuals shall not:

6 a. make copies for, or allow copies of any kind to be made by any other
7 person of the Protected Material in this case or permit dissemination of the Protected Material
8 at the Southern Nevada Detention Center jail facility, or any other detention facility where the
9 Defendants are housed, to include leaving a copy of the Protected Material at any detention
10 facility where the Defendants are housed;

11 b. allow any other person to watch, listen, or otherwise review the Protected
12 Material;

13 c. use the Protected Material for any other purpose other than preparing to
14 defend against or prosecute the charges in the indictment or any superseding indictment arising
15 out of this case; or

16 d. attach the Protected Material, a transcript derived from the Protected
17 Material, or any quotations from the Protected Material that contains personal identifying
18 information to any of the pleadings, briefs, or other court filings except to the extent those
19 pleadings, briefs, or filings are filed under seal.

20 6. Nothing in this stipulation is intended to restrict the parties’ use or introduction of
21 the Protected Material as evidence at trial or support in motion practice. If the defendants
22 proceed to trial or any evidentiary hearing, the parties will confer to determine whether the terms
23 of this stipulation should be revisited.

1 7. The parties shall inform any person to whom disclosure may be made pursuant
2 to this order of the existence and terms of this Court's order.

3 8. The defendants hereby stipulate to this protective order.

4 DATED this June 27th, 2024.

5 Respectfully submitted,

6 For the United States:

7 JASON M. FRIERSON
8 United States Attorney

9 /s/ Steven J. Rose

10 STEVEN J. ROSE
 Assistant United States Attorney

11 For the Defense:

12 /s/ Kathleen Bliss

13 KATHLEEN BLISS
 Attorney for Defendant FUNCHESS

14 RENE L. VALLADARES
15 Federal Public Defender

16 /s/ Raquel Lazo

17 RAQUEL LAZO
 Assistant Federal Public Defender and
18 Attorneys for Defendant BRYANT

19 /s/ Abel Yanez

20 ABEL YANEZ
 Attorney for Defendant PERROT

21 /s/ William Brown

22 WILLIAM BROWN
 Attorney for Defendant PATTERSON

23 /s/ Lauria Lynch-German

24 LAURIA LYNCH-GERMAN
 Attorney for Defendant HARRIS

/s/ Carl Arnold
CARL ARNOLD
Attorney for Defendant BERNSTEIN

/s/ Kendall Stone
KENDALL STONE
Attorney for Defendant GRINAGE

/s/ Thomas Ericsson
THOMAS ERICSSON
Attorney for Defendant BEAUFORD

/s/ David Brown
DAVID BROWN
Attorney for Defendant MCQUAIG

IT IS SO ORDERED:


HONORABLE ELAYNA J. YOUCHAH
United States Magistrate Judge

June 28, 2024
Date